UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: PETER N. DECONZO and : CHAPTER 13

DONNA DECONZO a/k/a

DOMINICA DECONZO

Debtor(s)

:

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

Movant

:

VS.

:

PETER N. DECONZO and DONNA DECONZO a/k/a

DOMINICA DECONZO

Respondent(s) : CASE NO. 5-19-bk-01904

OBJECTION TO DEBTORS' EXEMPTIONS

AND NOW, this 15th day March, 2019, comes Charles J. DeHart, III,

Standing Chapter 13 Trustee, and objects to the debtors' exemptions for the following reason(s):

1. Debtors' exemption of 100% of Fair Market Value without proof of the asset's value deprives unsecured claimants of the asset's value to the estate if it was liquidated under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's

Objection to Debtors' Exemptions.

Respectfully submitted,

/s/Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717)566-6097

CERTIFICATE OF SERVICE

AND NOW, this 13th day June, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Ronald Santora, Esquire 1188 Wyoming Avenue Forty Fort, PA 18704

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee